

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF LOUISIANA, STATE OF
MISSOURI, *et al.*

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, *et
al.*,

Defendants.

Case No. 3:22-cv-01213-TAD

**PLAINTIFFS' NOTICE OF FILING DEPOSITION
TRANSCRIPT AND EXHIBITS OF ELVIS CHAN**

Plaintiffs State of Louisiana, State of Missouri, Dr. Jayanta Bhattacharya, Dr. Martin Kulldorff, Dr. Aaron Kheraity, Jim Hoft, and Jill Hines hereby give notice of filing the redacted certified deposition transcript and exhibits of the deposition of Elvis Chan. Attached to this Notice, redacted where necessary to comply with the Court's protective order, are Exhibits 1-23 from the deposition of Elvis Chan (labeled "Chan Ex. 1" to "Chan Ex. 23"), and the certified transcript of the deposition of Elvis Chan, also redacted where necessary to comply with the Court's protective order.

Dated: March 3, 2023

**ANDREW BAILEY
Attorney General of Missouri**

/s/ Charles F. Capps

Joshua M. Divine, Mo. Bar No. 69875*
Solicitor General
Charles F. Capps, Mo. Bar No. 72734*
Deputy Solicitor General
Todd A. Scott, Mo. Bar No. 56614*
Senior Counsel
Kenneth C. Capps, Mo. Bar No. 70908*
Assistant Attorney General
Missouri Attorney General's Office
Post Office Box 899
Jefferson City, MO 65102
Tel: (573) 751-8870
charles.capps@ago.mo.gov
Counsel for State of Missouri

/s/ Jenin Younes

Jenin Younes *
John J. Vecchione *
New Civil Liberties Alliance
1225 19th Street N.W., Suite 450
Washington, DC 20036
Direct: (202) 918-6905
E-mail: jenin.younes@ncla.legal
*Counsel for Plaintiffs Dr. Jayanta Bhattacharya,
Dr. Martin Kulldorff, Dr. Aaron Kheriaty,
and Jill Hines*

Respectfully submitted,

**JEFFREY M. LANDRY
Attorney General of Louisiana**

/s/ Tracy Short

Elizabeth B. Murrill (La #20685)
Solicitor General
Tracy Short (La #23940)
Assistant Attorney General
D. John Sauer (Mo #58721)*
Special Assistant Attorney General
Louisiana Department of Justice
1885 N. Third Street
Baton Rouge, Louisiana
Tel: (225) 326-6766
murrille@ag.louisiana.gov
Counsel for State of Louisiana

/s/ John C. Burns

John C. Burns
Burns Law Firm
P.O. Box 191250
St. Louis, Missouri 63119
P: 314-329-5040
E-mail: john@burns-law-firm.com
Counsel for Plaintiff Jim Hoft

* admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that, on March 3, 2023, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ Tracy Short